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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 THE DANIELS FAMILY 2001 REVOCABLE
16 TRUST, Individually and On Behalf of All
Others Similarly Situated,

17 Plaintiff,

18 ||

19 LAS VEGAS SANDS CORP., DR. MIRIAM
20 ADELSON, in her capacity as Special
21 Administrator of the estate of SHELDON
G. ADELSON, PATRICK DUMONT, and
ROBERT G. GOLDSTEIN,

Defendants.

Case No.: 2:20-cv-01958-CDS-EJY

**STIPULATION REGARDING
DEADLINE FOR PARTIES TO
SUBMIT DISCOVERY PLAN AND
SCHEDULING ORDER**

24 Defendants Las Vegas Sands Corp., Dr. Miriam Adelson, in her capacity as Special
25 Administrator of the Estate of Sheldon G. Adelson, Patrick Dumont, and Robert G. Goldstein
26 (collectively, “Defendants”), and Lead Plaintiffs Carl S. Ciaccio and Donald M. DeSalvo
27 (collectively, “Plaintiffs,” and together with Defendants, “the Parties”) stipulate that the deadline
28 for the Parties to submit a discovery plan and scheduling order by January 12, 2024 has been

1 mooted by the Court’s recent orders granting Defendants’ Motion for Reconsideration and
 2 dismissing Plaintiffs’ Second Amended Complaint. *See* ECF Nos. 146, 147. The Parties further
 3 state as follows:

4 1. On August 8, 2023, the Court issued an Order granting in part and denying in part
 5 Defendants’ motion to dismiss Plaintiffs’ Second Amended Complaint. ECF No. 108.

6 2. On August 22, 2023, Defendants filed a Motion for Partial Reconsideration, or for
 7 an Order Certifying an Interlocutory Appeal, of the Court’s August 8 Order, ECF No. 109 (“Motion
 8 for Reconsideration”), and a Motion for Stay Pending Adjudication of Defendants’ Motion for
 9 Reconsideration, ECF No. 110 (“Motion for Stay”).

10 3. On September 29, 2023, Plaintiffs filed a Motion for a Rule 16 Pretrial Conference
 11 and Order Directing the Parties to Meet and Confer on Scheduling and Discovery. ECF No. 121
 12 (“Motion on Scheduling and Discovery”).

13 4. On October 23, 2023, Magistrate Judge Youchah granted Plaintiffs’ Motion on
 14 Scheduling and Discovery in part, and ordered the parties to submit a discovery plan and scheduling
 15 order in accordance with her comments on the record on October 23 (the “Discovery Plan”) by
 16 December 18, 2023. ECF Nos. 131 & 132.

17 5. On November 13, 2023, Judge Silva entered a Minute Order setting a hearing on
 18 Defendants’ Motion for Reconsideration. ECF No. 134. After being rescheduled due to scheduling
 19 conflicts, the hearing was set for December 19, 2023. ECF Nos. 139, 140.

20 6. In light of the hearing date before Judge Silva, the Parties agreed to extend the
 21 deadline for submitting the Discovery Plan to and until January 12, 2024, and Magistrate Judge
 22 Youchah granted an extension accordingly. ECF No. 142.

23 7. On December 19, 2023, after hearing oral argument from the Parties, Judge Silva
 24 issued a Minute Order granting Defendants’ Motion for Reconsideration. ECF No. 146. The Minute
 25 Order also denied Defendants’ Motion for Stay (*see id.*), which was mooted by the ruling on
 26 Defendants’ Motion for Reconsideration.

27 8. On January 2, 2024, Judge Silva issued an Amended Order Regarding Plaintiffs’
 28 Motion for Reconsideration, Defendants’ Motion to Dismiss the Second Amended Complaint, and

1 the Parties' Leave to File Supplemental Authority. ECF No. 147 (the "Amended Order").
 2 Consistent with the prior Minute Order granting Defendants' Motion for Reconsideration, the
 3 Amended Order dismissed the Second Amended Complaint in its entirety. *See id.* at 24.

4. The Parties agree that the Court's Amended Order dismissing the Second Amended
 5 Complaint moots the Court's prior order directing the Parties to submit a Discovery Plan, and that
 6 the deadline for the Parties to submit a Discovery Plan by January 12, 2024 should be stricken
 7 accordingly.

8 For the foregoing reasons, the Parties respectfully request that the Court enter an order
 9 striking the Parties' January 12, 2024 deadline to file a Discovery Plan.

10
 11 Dated: January 12, 2024

12
ALDRICH LAW FIRM, LTD.

13 By: /s/ Shannon L. Hopkins

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**IT IS SO ORDERED; provided, however, if a Third
 46 Amended Complaint ("TAC") is filed, the parties
 47 must submit a proposed discovery plan and
 48 scheduling order no later than seven (7) days after
 49 the pleading responding to the TAC is filed.**

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